

**UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS**

**CRIMINAL DOCKET
NO. MJ# 04-802-MBB**

UNITED STATES OF AMERICA

V.

CHRISTIAN CARDONA

FILED
In Open Court
USDC, Mass.
Date 4/5/04
By [Signature]
Deputy Clerk 2:15 pm

**DEFENDANT CHRISTIAN CARDONA'S
MOTION TO SET CONDITIONS OF RELEASE**

Now comes the defendant, Christian Cardona, in the above-captioned matter and, pursuant to 18 U.S.C. §3142, moves this Court to set terms of his release.

In support of his motion the defendant's lawyer says that there are adequate conditions of release to satisfy the Court that the he does not and will not pose a risk of flight under 18 U.S.C. §3142(f)(2)(A) and that he will appear in the Eastern District of New York to answer Complaint No. 04-0423 M now pending in that district. Specifically, the defendant proposes the following:

- (1) that he be allowed to regularly report to Pretrial Services either in person or be telephone as directed by the Court or Pretrial Services;
- (2) that his mother Sandra Quintana sign an unsecured bond insuring the

- 2 -

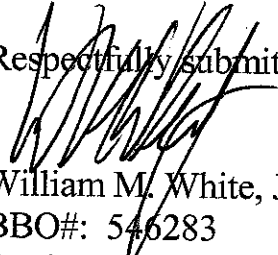
defendant's appearance at all future court dates;

- (3) that he be permitted to reside at 211 Glasgow Street, Apartment #1, Fall River, MA with his mother, Sandra Quintana and his minor brothers and sisters, Christopher, 15 years, Christosue, 12 years, and Chrystal, 5 years;
- (4) that he be required to maintain his employment with Loyalty Records, 417 Mystic Avenue, Medford, MA (781) 396 – 0607, contact Geraldo Rivera;
- (5) that a curfew consistent with his hours of employment be set and/or that a contact at Loyalty records be determined so that Pretrial Services can verify that the defendant is working;
- (6) that he be required to make all appearances in the Eastern District of New York, as directed by that court;
- (7) that he not apply for a passport or otherwise attempt to leave the country and;
- (8) that he be permitted to comply with such other conditions as the Court and/or Pretrial Services directs.

- 3 -

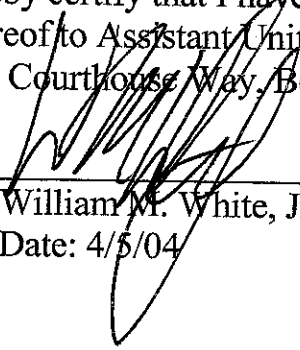
As reason therefore, the defendant says that his lawyer has conferred his mother, Sandra Quintana, Geraldo Rivera of Loyalty Records, the defendant and the government relative to the proposed terms. The defendant's lawyer further says that he has conferred with Mr. Geraldo Rivera and Mr. Rivera has agreed to cooperate with the Court and Pretrial Services with respect to any conditions imposed or to be imposed by the Court. Mr. Rivera has agreed that the defendant will continue to be employed Loyalty Records.

Respectfully submitted,


William M. White, Jr.
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C E R T I F I C A T E O F S E R V I C E

I, William M. White, Jr., do hereby certify that I have served a copy of the above motion by delivering a copy thereof to Assistant United States Attorney Theodore B. Heinrich, **in hand**, at One Courthouse Way, Boston, Massachusetts.



William M. White, Jr.
Date: 4/5/04